



Deer Springs Fire Protection District

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Mark Slovick, Project Planner
County of San Diego
Planning and Development Services
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Mr. Slovick,

The following are comments of the Deer Springs Fire Protection District in reference to the Lilac Hills Ranch Proposal (TM-5571, TM-5572, SP 12-001).

Service delivery options for the proposed development:

The proposals of the developer have consistently held that the CAL FIRE Miller station is the closest and therefore most appropriate fire station location for service to this project. This is a position that is not, and will not be supported by the Deer Springs Fire Protection District (DSFPD). The assumption that the Miller Fire station will be location of primary responders for fires and other emergencies on the project should be summarily dismissed. CAL FIRE is not the fire agency having jurisdiction and the idea of co-located facilities with the DSFPD assumes a permanent relationship between the agencies and presents significant complications should there be changes to the either the CAL FIRE deployment strategy in the area, or a contractual change with the DSFPD or the SDCFA. It must be recognized that the District does not and cannot accept conditions pre-dictating ongoing relationships with other agencies or siting of permanent facilities based on current relationships that may not be similarly permanent.

Further, the District is unable to support an additional facility for provision of a level of service within the project comparable to that received by existing residents based on the projected revenue generated by the project at build-out. The District cannot accept any proposals for service that are fiscally untenable, as it jeopardizes the ongoing provision of service to existing residents. The District is not inclined to consider staffing options that significantly depart from the standard level of service currently provided in the District. Presently, the District provides response with advanced life support engines with three career personnel. Alternate staffing arrangements are not an option as it would result in a disparate level of service at the same or greater level of tax burden.

Given the aforementioned issues, it is the position of the District that in dealing with response to the Lilac Hills Ranch Proposal, there are the following options:

Option 1:

Relocate the existing Station 11 to an agreed upon location within the project area.

This option would place a replacement facility for the current Station 11 within the project. This option would require a site location that would meet the specified general plan response time needs while maintaining an adequate response to the current residents of the District. A location within the project meeting these criteria is most likely to exist in the southernmost portion of the proposed development. This option will likely require some roadway modifications to satisfy response times to the northern end of the project especially given the phasing plan. Under this option the district would prefer to see unrestricted north/south access through the project with a minimum of traffic calming devices. Additionally, this option will require an evaluation of potential off-site road improvements to Circle R Drive.

A location for this facility would require an evaluation of available sites, and modeling of response times to both the project and existing properties in the district. The cost of this study would be borne by the developer.

It should be noted that Station 11 is a headquarters facility and replacement of the facility will require replacement of the headquarters functions that meet or exceed those currently in place.

Option 2:

Relocate the existing Station 11 to an agreed upon location outside of the project area.

This option would place a replacement facility for the current Station 11 on a site outside of the project but in a location suitable for achieving acceptable response times for both the project and for existing residents. A location suitable would need to be located through a comprehensive evaluation of available properties and based on modeling of response times. It is likely that some modifications to roadways would be necessary to facilitate response times to areas of the project in order to achieve adequate response.

A location for this facility would require an evaluation of available sites, and modeling of response times to both the project and existing properties in the district. The cost of this study would be borne by the developer.

It should be noted that Station 11 is a headquarters facility and replacement of the facility will require replacement of the headquarters functions that meet or exceed those currently in place.

It should be noted that neither of these options requires the support of additional staffing or equipment. The district feels that these are both realistic options that deserve maximum consideration in the development of this project.

Additional Comments:

The FPP continues to have factual inaccuracies regarding the district. The Deer Springs Fire Protection District (DSFPD) operates 3 fire stations (Stations 11, 12, and 13), with 3 front line Type I engines, 2 reserve Type I engines (unstaffed, with one at Station 11, and one at Station 13), 1 Type III engine (Station 12). The district does not employ a fire marshal, but has had a Fire Prevention Specialist during the scope of the FPP's development. The District also employs 1 administrative employee, not 2 as listed.

For purposes of clarity, the Miller Fire Station exists in support of the CAL FIRE mission of suppression of wildland fires in State responsibility areas (SRA). While they represent an important part of the cooperative fire protection system in the region, their statutory mission is to respond to State wildland fires. The station is not equipped or staffed based on the needs of a typical suburban fire department. Even if supplemental staffing or equipment was provided, it is likely that fire activity elsewhere in the state might pull that resource out of the area for protracted periods of time. The "must cover" concept mentioned in the FPP only provides that a CAL FIRE engine from another area of the county or the state (the most recent significant coverage was provided by an engine from San Luis Obispo) will assume coverage of the station at some point. This may cause difficulties in expecting consistent service at a level above what is typically provided by CAL FIRE funded engine companies. Assuming that the development of this project in any way alters the fundamental responsibilities of CAL FIRE is incorrect.

The Miller Fire Station, while in the District, is wholly operated by CAL FIRE during the majority of the year and is not in any way under the operational control of the DSFPD. This relationship can be confusing due to the contractual relationship for staffing with CAL FIRE presently in place within the DSFPD. Additionally, it should be noted that the staffing at the Miller Station during the "Amador" period that is supported by the San Diego County Fire Authority is only 2 personnel, not the 3 personnel that is the standard on DSFPD resources. The Miller Station is a non-paramedic level facility year round.

Finally, the District will expect any project to be built in full compliance with all existing standards, codes, and ordinances for the purpose of providing the maximum level of fire and life safety for our future residents, and for the continuing safety of our responders.

This proposal is of significant concern to the Deer Springs Fire Protection District. If you have any questions or concerns, please contact me at (760) 749-8001.

Sincerely,

Chris Amestoy
Fire Chief
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